

Equality Impact Assessment (EqIA) for London Plan Guidance

1 Overview

London Plan Guidance name: Draft Digital Connectivity Infrastructure (DCI) London Plan Guidance

Stage (Pre-consultation / post-consultation): Consultation

Date of EqIA assessment: July-October 2023

Please provide a brief outline of the guidance:

The Draft LPG supports the implementation of the London Plan Policy SI 6 DCI through provision of clear technical and practical guidance for compliance.

Policy SI 6 A states development proposals should:

- 1) ensure sufficient ducting space for full fibre is provided to all end users within new developments unless affordable alternative 1GB/s-capable connection is made available to all end users,
- 2) meet expected demand for mobile connectivity generated by the development,
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas (where that is not possible, any potential reduction would require mitigation),
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure’.

Policy SI 6 A B states: “Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access”.

The focus of the LPG will be in providing guidance on S16 clause 2 to 4 and SI6 B only. This is due to changes to the Building Regulations in December 2022 which mean that clause 1 of SI 6 A - is now superseded by the Building Regulations - Part R. It is therefore not covered by this LPG.

The LPG’s aims are to:

- clarify the key requirements for developments to provide appropriate DCI for its potential end-users (section 1 and 2 of LPG),
- address the impact of development on existing DCI and impacts of any stand-alone DCI in the public realm (section 2 of LPG),
- provide support for how to plan for DCI through Local Plans (section 3 of the LPG).

The LPG supplements Policy SI6 on DCI, which seeks to improve digital connectivity via physical infrastructure delivery across London. It will do so via both new development

proposals and better supported through plan-making functions in boroughs. The LPG by improving digital connectivity – and thereby digital access – the LPG will help improve one of the key dimensions of digital exclusion.

Who is the guidance aimed at?

The LPG aims to provide guidance to planning officers to determine planning applications and help inform the preparation of Local Plans as appropriate. It also aims to provide guidance for applicants, developers, telecommunications operators, community groups, local authorities, and others.

What are the key issues to be aware of?

The LPGs purpose is to ensure that development proposals provide the appropriate DCI; should meet the expected demand for fixed and/or mobile connectivity for end-users; and if appropriate support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located DCI.

This LPG will ensure the policy requirements are more consistently applied in planning decision-making across all London boroughs where current practices on DCI delivery appears subject to local variations. It will provide greater clarity for both planning applicants and planning officers. The guidance could help steer industry and local planning authorities to work more closely to address any gaps in network coverage and capacity across London. It could thereby improve digital connectivity.

Background context for the LPG:

The DCI LPG seeks to supplement the London Plan Policy SI6, the Mayors manifesto commitments from 2021, and the current national legislation and policy such as Building Regulations and the National Planning Policy Framework on DCI.

This LPG has sought to go beyond Part R1 of the Building Regulations 2010, which required buildings to be equipped with at least 30 MB/s ready in-building physical infrastructure. However, recent changes to Building Regulations mean that London Plan policy SI6 A, clause 1 – requiring the delivery of full-fibre or equivalent digital infrastructure - has effectively been – superseded and is now covered by building regulations. As such it is not covered in any detail within this LPG.

The Mayor's 'Digital Access for All' mission seeks to ensure that "every Londoner to has access to good connectivity, basic digital skills and the device or support they need to be online by 2025". The mayors wider approach goes further, which seeks to influence the three components of digital exclusion: access, affordability, and ability.

London Plan Policy SI 6 seeks to compliment the Mayor's approach, by addressing spatial inequalities in the delivery of improved physical digital infrastructure. Thus, it aims to ensure all Londoners can actively participate in opportunities. This infrastructure could bring broader more cumulative benefits in the following ways:

- Ensuring fast, high quality mobile connections are maintained and providing digital infrastructure, may also benefit those working from home. This includes, those with less mobility, carers, parents, or those on parental leave. It may also benefit, those on low incomes.

- Facilitating the delivery of digital services, which could help increase access to job opportunities; health advice; education and learning; shopping and leisure activities. The cumulative impact of improved connectivity could contribute to improved health and wellbeing, and overall life chances.
- Opportunities to access online health, education, leisure, and shopping services could help to reduce the overall need to travel in the future. This would support less mobile individuals, or those living in areas with poorer transport connections.
- It could also benefit those travelling around the city at night, who are at a higher risk of becoming a victim of crime, as they would be able to call a friend or law enforcement.
- It could improve connectivity for those visiting shopping centres and other public spaces.

The LPG seeks to: address gaps in provision; ensure that the right coverage and capacity are provided to meet existing/new user needs; and avoid reducing mobile connectivity in certain buildings and surrounding areas. This is particularly important for more deprived parts of the city, and for less mobile communities in improving their life chances and economic vitality.

Which of the Public Sector Equality Duty (PSED) aims¹, considered in turn, are relevant to the guidance and the impacts identified?

- 1) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by or under the Equality Act 2010 (the Act).

No

- 2) Advance equality of opportunity between people who share a protected characteristic and those who do not.

Yes – the guidance can help create a level playing field and ensure greater digital access for all.

- 3) Foster good relations between people who share a protected characteristic and those who do not.

Yes – the guidance can help create a level playing field and ensure greater digital access for all.

1 Please see Appendix C for legal context/background information.

2 Assessment

List aspects of the guidance that might impact those with protected characteristics or other identified group(s)²

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
<p>SI6 A (2-4) - encourages all new buildings/redevelopments planning proposals to be DCI ready. Builds in the potential for inclusivity through its provision upfront, so that all occupants/end-users can have access to digital connectivity (though users will still need to pay for a contract). However, it could eliminate the need to undertake additional expenses for DCI retrofitting later if buildings are made DCI ready upfront.</p>	<p>Positive: Most likely to benefit: Black, Asian, and Minority Ethnic people; disabled people; older people; younger people; people on a low income; LGBTQ+ people; women; and pregnant people.</p>
<p>SI6 A (4): specially sets out that DCI apparatus on highways does not impede circulation. Obstructions on footways, cycle routes and any shared routes by cabinets/equipment should be minimised and/or mitigated to maintain unrestricted public access. It suggests that, when siting infrastructure, to minimise the impacts on public access at street level for different groups.</p>	<p>Positive: Most likely to benefit disabled people, including people affected by sight loss; wheelchair users, people with invisible disabilities. It could also benefit older people, and people with buggies or mobility vehicles.</p>
<p>SI6 B - Could promote greater impetus for planning departments through their local plan functions to co-ordinate better within the council across other departments. It could also enable, other stakeholders to deliver a more joined up and targeted digital approach locally to physical DCI provision and targeting better connectivity and coverage in hard-to-reach areas by engaging more pro-actively with the digital industry, to ensure connectivity benefits beyond just individual development proposals.</p>	<p>Positive: The guidance can help create a level playing field for all.</p>

It should be noted that the general policy requirement and principles are already required through the London Plan. This LPG is providing further detail on how the policies should be implemented, and therefore further amplifying the effects.

² Including those that share one of the nine protected characteristics in the Equality Act 2010 (please see Appendix C for definitions), and other groups that are likely to be affected by equalities issues. These include, people on low incomes; carers; refugees and asylum seekers; looked after children; care leavers; UK armed forces veterans; homeless people and rough sleepers; ex-offenders and people with experience of the criminal justice system.

2.1 Equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this guidance for specified groups (including those that share a protected characteristic).

The objectives from the London Plan Integrated Impact Assessment and the EqIA guide questions are used where relevant to structure the answers.

Where possible, evidence (including engagement)³ is cited, for impacts. For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an [objective justification](#) is provided. For positive impacts, considerations are given to how these could be maximised.

The impacts are scored as follows:

- strong positive
- positive
- neutral
- negative
- strong negative
- mixed (both positive and negative impacts identified) or uncertain.

Further explanation of the PSED aims and definitions of protected characteristics can be found in Appendix C.

[If impacts have been identified for particular user groups / stakeholders (e.g., residents, business owners such as market traders, employees, service users etc), make this clear in your assessment and overview of equality impacts.]

Age (consider particularly children, under-21s and over-65s)

Potential positive impacts and scores

Strong positive impact for older Londoners and young Londoners in low-income households.

Relevant mechanisms are:

- ensuring DCI connectivity and avoiding worsening mobile connectivity; and the digital inclusion and improved access to services this promotes;
- avoiding physical barriers that impede mobility.

Why this particularly benefits older and low-income younger Londoners:

Older Londoners are more likely to experience social isolation and digital exclusion,

³ See Appendix A and B

particularly if they have low incomes, and if they live alone. This presents additional barriers to accessing the services and support they need to live well. The LPG is likely to positively impact these Londoners.

It is likely to benefit young and older children (including teenagers) living in low-income households and experiencing digital exclusion due to high costs. Some of these households may rely more on mobile phones for internet connections; these could benefit from improved mobile connectivity to access the internet (e.g., through appropriate mobile masts on roofs or in the public realm nearby). Increased online opportunities to access online health, education, leisure, and shopping services could help to reduce the overall need to travel in the future. This would support less mobile individuals and those living in areas with poorer transport connections.

Ensuring fast, high quality mobile connections are provided and maintained may also benefit those working from home, such as those with less mobility, carers, parents, and those on parental leave. It may also benefit those on low incomes. The LPG seeks to ensure the right coverage and capacity are provided to meet user needs and avoid reducing mobile connectivity in certain buildings and surrounding areas because of new DCI provision. Once improved digital connectivity has been achieved, it can facilitate benefits such as the greater take up of social tariffs (affordability) and increase mobile connectivity especially for those relying on mobile phones for internet access.

Potential negative impacts, mitigations or objective justification and scores

None identified (likely to make people more visible and able to connect)

Relevant PSED aim(s)⁴

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

Disability (consider different types of physical, learning, or mental disabilities)

Potential positive impacts and scores

Strong positive impact for Londoners with a disability and those in low-income households.

Relevant mechanisms are:

- ensuring DCI connectivity and avoiding worsening mobile connectivity and the digital inclusion and improved access to services this promotes;
- avoiding physical barriers that impede mobility.

⁴ See Appendix C for the PSED aims

Why this benefits Londoners with a disability and those in low-income households:

There is evidence suggesting that a large proportion of adult disabled people are likely to be internet non-users to face digital exclusion. Thus, for disabled people irrespective of age having appropriate built-in physical DCI provision where they live could strongly enhance their social inclusion opportunities (e.g., those with mobility issues could be saved from having to travel unduly for services or everyday needs). Increased online opportunities to access online health, education, leisure, and shopping services could help to reduce the overall need to travel in the future, supporting less mobile individuals and those living in areas with poorer accessible transport connections.

Ensuring fast, high quality mobile connections are provided and maintained may also benefit those working from home, such as those with less mobility, carers, parents, and those on parental leave, as well as those on low incomes. It seeks to ensure the right coverage and capacity are provided to meet user needs and avoid reducing mobile connectivity in certain buildings and surrounding areas because of new DCI provision. Once improved digital connectivity has been achieved, it can facilitate benefits such as the greater take up of social tariffs (affordability) and increased mobile connectivity especially for those relying on mobile phones for internet access.

The LPG seeks to optimise the use of rooftops and public realm to accommodate better designed and suitably located mobile DCI. It seeks to discourage poor siting, such as cabinets, transformers, and masts in the public realm, which may restrict public access for all at street level – poor siting can restrict pavement width. This consideration of appropriate siting could benefit disabled people, including people affected by sight loss, wheelchair users and, people with invisible disabilities, and older people.

Potential negative impacts, mitigations or objective justification and scores

None identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

Gender reassignment

Potential positive impacts and scores

Likely to make people more visible and able to connect.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic

and those who do not.

- 2

Marriage and civil partnership

Potential positive impacts and scores

Likely to make people more visible and able to connect.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)⁵

N/A.

Pregnancy and maternity

Potential positive impacts and scores

Potentially positive impacts as greater digital access could help in accessing midwives and other medical support; and save on travel for medical services at a time when it may be difficult to walk, etc.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

Race (consider refugees, asylum seekers, migrants, Gypsies and Travellers)

Potential positive impacts and scores

Strong positive impact for Londoners from Black, Asian, and Minority Ethnic (BAME) and other backgrounds, including those in low-income households.

⁵ Only the first of the three PSED aims (eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act) applies to this characteristic.

Relevant mechanisms are:

- ensuring DCI connectivity and avoiding worsening mobile connectivity and the digital inclusion and improved access to services this promotes,
- avoiding physical barriers that impede mobility.

Why this benefits Londoners from Black, Asian, Minority Ethnic, and other backgrounds, including those in low-income households:

Londoners from Black, Asian, Minority Ethnic backgrounds are more likely than those from a White background to live in poverty and overcrowded households, and to experience difficulties with housing costs. The Mayor's Digital Access for All mission research shows that Londoners with a Minority Ethnic origin, culture, and language are more likely to live in areas where connectivity is poor; and those on low incomes are more likely to be digitally excluded.

In particular, Gypsies and Travellers experience high levels of digital exclusion. They are less likely to use the internet regularly; less likely to possess digital skills; and significantly less likely to have a household internet connection than the majority population'. One key finding is that only 38 per cent of Gypsies and Travellers (33 per cent if housed) had a household internet connection, compared to 86 per cent of the general population. The most important ways this group accessed the internet was through mobile data and/or public Wi-Fi⁶. To some extent, understandings of digital exclusion issues faced by the Gypsy and Traveller community are likely to be applicable to other displaced communities, such as refugees and asylum seekers, for whom digital participation may strengthen their social inclusion.

Ensuring fast, high-quality mobile connections are provided and maintained may also benefit those working from home, such as those with less mobility, carers, parents, and those on parental leave, as well as those on low incomes. The LPG seeks to optimise the use of rooftops and public realm to accommodate better designed and more suitably located mobile DCI. Through this it seeks to: ensure the right coverage and capacity are provided to meet user needs; and avoid reducing mobile connectivity in certain buildings and surrounding areas because of new DCI provision. Once improved digital connectivity has been achieved, it can facilitate benefits such as the greater take-up of social tariffs (affordability) and increased mobile connectivity, especially for those relying on mobile phones for internet access.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

6 Friends Families and Travellers: Report on Digital Inclusion in Gypsy and Traveller Communities, 2018

- 2

Religion or belief

Potential positive impacts and scores

To the extent that households holding specific religious beliefs belong disproportionately to Black, Asian, and Minority Ethnic groups, they are likely to experience similar impacts to those identified for Black, Asian, and Minority Ethnic backgrounds. (positive). It is likely to make people more visible and able to connect.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

Sex

Potential positive impacts and scores

Strong positive impact for women and girls in particular and those in low-income households.

Relevant mechanisms are:

- ensuring DCI connectivity and avoiding worsening mobile connectivity and the digital inclusion and improved access to services this promotes,
- avoiding physical barriers that impede mobility.

Why this benefits women and girls, and those in low-income households:

It is reported that women have consistently made up over half of internet non-users, compared to men. Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families and will benefit particularly from measures to improve digital access. It is also expected such women are more likely to undertake a greater share of childcare and therefore support children with homework which may be on-line. The evidence also suggests that many under the age group of 18s have no internet access at home from a computer or tablet; this may make it difficult to complete schoolwork. Collectively the data suggests women are more likely to be digitally excluded, and that there may be detrimental educational knock-on effects on their children.

Furthermore, teenage girls are more likely to have restrictions placed on their mobility freedoms due to the perceived dangers of venturing too far to access public space and/or services. Girls and young women often report feeling unsafe when spending time in public

spaces. Conversely, this may mean more time spent at home and needing to access the internet for educational resources, entertainment, and other service needs. However, if they live within a digitally excluded household they could be further disadvantaged. Improved connectivity could benefit women/girls (and others) visiting shopping centres and other public spaces; and travelling around the city at night. In these circumstances, these spaces could feel safer and more accessible, as these individuals would be able to call a friend or law enforcement in case of a problem.

Both these groups may rely more on home internet and mobile phones for everyday needs – improved digital access through improved mobile connectivity through DCI will be vital and could enable them access to social tariffs (affordability) and increase digital inclusion.

More generally, the analysis of the gendered nature of digital exclusion is very sparse in the existing evidence available. Any understanding around this group's experiences of digital exclusion is likely to mirror those within the race, disability, and low-income (poverty) groupings already discussed. The LPG is considered likely to have positive impacts for this group, as it aims to provide more opportunity for digital access and inclusion.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

Sexual orientation

Potential positive impacts and scores

It is likely to have positive benefit. It is expected that LGBTQI+ communities may rely heavily on connectivity to remain visible and to replace disappearing safer spaces in London.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

People on low incomes⁷

Potential positive impacts and scores

Strong positive impact for all socio-demographic groups in London and those in low-income households, as it aims to provide more opportunity for digital access and inclusion for all Londoners.

Relevant mechanisms are:

- ensuring DCI connectivity and avoiding worsening mobile connectivity and the digital inclusion and improved access to services this promotes,
- avoiding physical barriers that impede mobility.

Why this benefits all socio-demographic groups in London and those in low-income households:

Londoners from low-income backgrounds are more likely to be from Black, Asian, and Minority Ethnic backgrounds. They are more likely than those from a White background to live in poverty and overcrowded households, and experience difficulties with housing costs. The limits of the evidence in this context are also noted: these are Black and Minority Ethnic statistics on poverty and deprivation, and not wider statistics that would provide insight into the intersectional impacts. It is acknowledged that poverty in low-income households could have a significant impact of digital exclusion. Thus, if you are on a lower income, you have less chance of being online; if you are on a higher income, you are more likely to have online access.

It is also acknowledged that, as digital exclusion is often caused by poverty, strategies to tackle the problem must align with and reinforce wider work to improve low-income household's financial resilience. It must also include a strong focus on increasing access to affordable broadband connections and devices and improve internet connection in the home. Ensuring fast, high-quality mobile connections are provided and maintained may also benefit those working from home, such as those with less mobility, carers, parents, and those on parental leave, as well as those on low incomes.

The LPG seeks to optimise the use of rooftops and public realm to accommodate better designed and more suitably located mobile DCI. Through this it seeks to: ensure the right coverage and capacity are provided to meet user needs; and avoid reducing mobile connectivity in certain buildings and surrounding areas because of new DCI provision. Once improved digital connectivity has been achieved, it can facilitate benefits such as the greater take-up of social tariffs (affordability) and increased mobile connectivity, especially

⁷ The socio-economic duty was introduced into legislation as section 1 of the Act, with the aim of ensuring that public bodies had to take socio-economic disadvantage into account when making strategic decisions. However, in 2010, the newly formed coalition government decided not to implement the socio-economic duty. Though not a protected characteristic in the Act, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore considers equality impacts on people on low incomes as part of its decision making.

for those relying on mobile phones for internet access.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

Other groups such as carers; refugees and asylum seekers; looked after children; care leavers; UK armed forces veterans; homeless people and rough sleepers; ex-offenders and people with experience of the criminal justice system.

Potential positive impacts and scores

The evidence for 'other groups', as a category is more fragmented. However, it is expected to have a positive impact on such groups and likely to make people more visible and able to connect. In this context understandings of digital exclusion issues faced by the Gypsy and Traveller community are likely to be applicable to other displaced communities. This may include refugees and asylum seekers or those with non-traditional life circumstances, for whom digital participation may strengthen their social inclusion and increase opportunities.

In the absence of more nuanced evidence on how these other often under-represented and disadvantaged groups are affected by digital connectivity issues the assumption here is that they are likely to experience similar impacts to those identified for people from Black, Asian, and Minority Ethnic backgrounds, and low-income backgrounds, as well as others discussed above.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

To advance equality of opportunity between people who share a protected characteristic and those who do not.

- 2

2.2 Overview of equality impacts

Protected characteristic / group	Strongly positive impacts	Positive impacts	Neutral impacts	Negative impacts	Strong negative impacts	Mixed or uncertain impacts
Age	Yes					Yes
Disability	Yes					Yes
Gender reassignment		Yes				Yes
Marriage and civil partnership		Yes				Yes
Pregnancy and maternity		Yes				Yes
Race	Yes					Yes
Religion and belief		Yes				Yes
Sex	Yes	Yes				Yes
Sexual orientation		Yes				Yes
People on low incomes	Yes	Yes				Yes
Other groups		Yes				Yes

Cumulative impacts

The LPG aligns with policies that promote equal participation and social inclusion.

3 Amendments

N/A.

4 Recommendation

Based on the assessment, this table indicates the recommended course of action to decision makers with regard to reviewing the guidance.

Description	Recommended
No major change to the guidance is required: This EqIA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	X
Adjustments to the guidance are required to remove adverse impacts identified by the EqIA or better advance equality.	
Justify adverse impacts or missed opportunities to advance equality and continue with the guidance.	
Stop, rethink, or abandon when the EqIA shows actual or potential unlawful discrimination.	

5 Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor’s other strategies and will occur as part of reviewing the London Plan.

6 Appendix A: Evidence reference and content

6.1 Evidence

Age

Older people evidence:

House of Lords: Communications and Digital Committee, [Digital exclusion](#), 2023

It is reported that digital exclusion can affect people from all backgrounds and age groups, not just the elderly. The report states: “around 3.9 million people over 65 (31 per cent of this age group) do not use the internet at home, compared with just 320,000 (4 per cent) for those aged 35–44. More than 3.8 million internet users over 65 are categorised as ‘narrow users’. Of the 2.4 million adults with zero basic digital skills, more than half are over 75.18 but younger groups are also affected. More than one in five users (approximately 1.8 million people) aged 35–44 are ‘narrow users’. During the pandemic which began in 2020, one in five children did not have access to an appropriate device for home study in 2021, according to the Digital Poverty Alliance.”

Government Digital Service, [Government Digital Inclusion Strategy](#), 2014

“Reducing digital exclusion can help address many wider equality, social, health and wellbeing issues such as isolation. 81% of people over 55 say being online makes them feel part of modern society and less lonely”.

London Datastore, [Survey of Londoners 2021-22](#), 2022

“One of the headline findings in relation to those ‘experiencing ‘digital exclusion’, was that ‘around eight in 10 (81 per cent) digitally excluded Londoners were over the age of 50’.”

House of Commons, [Tackling the digital divide](#), 4 November 2021

“Elderly people and disabled people are also disproportionately more likely to be digitally excluded, which presents additional barriers to accessing the services and support their need to live well. People in these groups are also less likely to use the internet if they have low incomes, are older and if they live alone.”

London Datastore blog, [Poverty in London 2021/22](#), 27 March 2023

“One in nine pensioners in London are living in material deprivation, unable to access the necessities for today’s society. Around 95 per cent of Londoners were described as food secure, meaning that one in twenty lived in a household that was in food insecurity.”

ONS, [Exploring the UK’s digital divide](#), 4 March 2019

“Since 2011, adults over the age of 65 years have consistently made up the largest proportion of the adult internet non-users, and over half of all adult internet non-users were over the age of 75 years in 2018. This reflects the pattern of the younger generations becoming more likely to be frequent internet users... Lower rates of internet usage among the older age groups may in part reflect the fact that they are more affected by access issues associated with age, such as poor eyesight. In 2018, 5% of those not using the internet also reported that their disability prevented them from doing so”.

Younger people evidence:

House of Commons, [Tackling the digital divide](#), 4 November 2021

“1.5 million households in the UK currently only have access to a mobile internet connection at home (five per cent), including 6 per cent of all five to 15-year-olds, who have no fixed broadband access in their home”.

ONS, [Exploring the UK’s digital divide](#), 4 March 2019

“In 2018, 12% of those aged between 11 and 18 years (700,000) reported having no internet access at home from a computer or tablet, while a further 60,000 reported having no home internet access at all. Of those in this age group, 68% who did have home internet access reported that they would find it difficult to complete schoolwork without it, suggesting there may be educational implications for those without internet access.”

Rouge, [New ONS figures – The Great Digital Divide: Mapping the UK’s Internet Non-users](#), 4 January 2021

“In Inner London, almost half the population is in their early twenties to early forties (46.7 percent), compared to 30.9 percent in the rest of England. Much of the city is made up of the ‘young professional’ demographic, however there are still 347,000 people living offline out of the 9 million residents. Since 2017, London’s digital divide has closed by an impressive 31 percent.”

[The Great Digital Divide Mapping the UKs Internet Non-users \(4 January 2021\)](#)

“In Inner London, almost half the population is in their early twenties to early forties (46.7 percent), compared to 30.9 percent in the rest of England. Much of the city is made up of the ‘young professional’ demographic, however there are still 347,000 people living offline out of the 9 million residents. Since 2017, London’s digital divide has closed by an impressive 31 percent”.

Demographic background context: London Datastore, [London's population](#)

Key findings from the 2021 Census are as follows:

- London’s mid-2021 population was 8.797 million.
- Population growth over the decade is concentrated in older ages. There were fewer 0-to-4-year-olds and 20-to-29 year-olds in 2021 than in 2011.
- London’s population is much younger than the rest of the country.
- Economic migrants in their 20s and 30s, from within the UK and overseas, give London its distinctive age structure.
- The older population is much smaller in London as people migrate away from the capital to begin families, or as they move into retirement.
- In Tower Hamlets, 47 per cent of the population is aged 20-39; 33 per cent of London’s overall population is found in this group.
- Croydon has London’s largest population of those aged 40-64 (128,000, or 33 percent of the borough’s total population).
- Bromley has London’s largest population of those aged 65 and over (58,000, or 17 per cent of its total population).

Disability

House of Commons, [Tackling the digital divide](#), 4 November 2021

“Disabled people like elderly people are also disproportionately more likely to be digitally excluded, which presents additional barriers to accessing the services and support they need to live well. People in these groups are less likely to use the internet if they have low incomes, are older and if they live alone”.

House of Lords: Communications and Digital Committee, [Digital exclusion](#), 2023

“People with disabilities account for a disproportionately large number of internet non-users and are more likely to report lower levels of confidence. Disabilities may involve physical or mental impairments which pose different barriers to inclusion. The Lloyds Consumer Digital Index suggests individuals with disabilities are twice as likely to lack the basic digital skills needed to navigate life online.”

GLA Intelligence, [Equality, diversity and inclusion evidence base for London](#), June 2019

“Outside of the home, the nature of London’s built environment can support or form

barriers to participating in city life. This is particularly relevant to disabled people, older people, wheelchair users and those with push chairs, who face barriers in accessing many services and buildings because of how buildings, spaces and places are designed and managed.”

ONS, [Exploring the UK’s digital divide](#), 4 March 2019

“Across all age groups, disabled adults make up a large proportion of adult internet non-users. In 2017, 56% of adult internet non-users were disabled, much higher than the proportion of disabled adults in the UK population as a whole, which in 2016 to 2017 was estimated to be 22% (see Family Resources Survey 2016/17). For internet non-users aged between 16 and 24 years, 60% were disabled in 2017, a proportion that is the same as for those aged 75 years and older.”

Socio-demographic background for disability: GLA analysis of households-below-average-income data (end user dataset), quoted in [Affordable Housing LPG EqIA](#), May 2023

“Disabled people are more likely to live in the social rented sector compared with their non-disabled counterparts:

- Nearly 1 in 4 (24.9%) disabled people aged 16 to 64 years in the UK rent social housing compared with fewer than 1 in 10 (7.9%) non-disabled people, [Outcomes for disabled people in the UK 2021](#), ONS.
- In London this proportion rises to nearly one in three (30%). [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), Disability and Housing UK 2021, ONS, APS

“The proportion of disabled people living with parents has risen from 12.4% in 2013/14 to 16.4% in 2020/21. By contrast, the proportion of non-disabled people living with parents is more or less unchanged (up 1% from 18.2% in 2013/14 to 19.2% in 2020/21). ([Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), Disability and Housing UK 2021, ONS, APS).

“Deaf and disabled residents are more likely to be living in poverty: 36% of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 26% of those in families where no-one is disabled.”

Gender reassignment

Equality and Human Rights Commission, [Is England Fairer? The state of equality and human rights 2016](#), 1 March 2016

“A 2006 study of transgender and transsexual people’s experiences of inequality and discrimination found that 73% of surveyed transgender respondents had experienced harassment in public spaces (including comments, threatening behaviour, physical abuse, verbal abuse or sexual abuse) with 10% having been victims of threatening behaviour in public spaces (Whittle et al, 2007).”

GLA, [Urban Greening Factor LPG EqIA](#), September 2021

“In 2015, the Home Office reported a 9 per cent rise in police recorded transgender hate

crimes between 2013-14 and 2014-15. For almost all police forces (41 out of 44), transgender identity hate crime was the least commonly recorded hate crime (Home Office, 2015a).”

These fears and experiences could lead to people not wanting to leave their homes or opting to do meet more of their everyday needs online.

Marriage or civil partnership

No evidence was found that is relevant to the LPG.

Pregnancy and maternity

No evidence was found that is relevant to the LPG.

Race

ONS, [Exploring the UK’s digital divide](#), 4 March 2019

“Across the ethnic groups for which breakdowns were available, the proportion of people who have either never used the internet or have not used it in the last three months came down between 2011 and 2018. In 2011, there were wide disparities in recent internet use among the different ethnic groups, however, in 2018, this gap had narrowed. This is particularly the case for adults of Bangladeshi ethnicity. In 2011, 31.4% of them were internet non-users, higher than the figure for UK adults overall (20.3%). In 2018, the figure for Bangladeshi internet non-users had dropped to 8.0%, a figure that is now lower than for the UK overall (10.0%).”

The report also states: “Internet non-users’ refers to those who have never used the internet or last used it more than three months ago.”

GLA, [Census 2021 Report – Ethnic Group](#), November 2022

“The Census recorded 8.80 million usual residents in London – that is people living in London with no other address or whose main residence is in London. This number is believed to be temporarily reduced due to changes in some Londoners’ behaviour as a result of the Covid pandemic.”

The report includes the following key headlines:

- London’s population in 2020 was 9m. It is expected that by 2022 it will have returned to around this level.
- In 2021, London’s population of 8.8m comprised 4.73m people from a White background; 1.82m from an Asian background; 1.19m from a Black background; 0.51m from a Mixed or multiple ethnicities background; and 0.56m from a background of other ethnic groups.
- White groups made up 54 per cent of London’s population in 2021. Of the remaining 46 per cent, Asian groups made up 21 per cent; Black groups 14 per

cent; Mixed groups 6 per cent; and “other” ethnic groups 6 per cent.

- Across London, 3.24 million people (37 per cent of the city’s total population) identified as White British.
- The largest individual groups, other than White British, were Black African with 697,000 individuals; and Indian with 656,000 individuals. These two groups combined were almost matched by the 1.29 million identifying with “other” White groups (15 per cent of London’s population).

Religion or belief

To the extent that Londoners holding religious beliefs belong disproportionately to Black, Asian, and Minority Ethnic groups (Census 2021), they are likely to experience similar impacts to those identified for Black, Asian and Minority Ethnic backgrounds above.

Sex

ONS, [Exploring the UK’s digital divide](#), 4 March 2019

“Although the number of internet non-users has been declining, in 2018, 58% (3.1 million) of these were women, a proportion that has remained broadly consistent over time.”

[Census 2021 Report - Sexual orientation and Gender identity Snapshot \(January 2023\)](#)

Gender identity key statistics:

- “91 per cent of Londoners aged 16 or over (and 99 per cent of those who answered the question) stated that their gender identity was same as registered at birth.
- After those answering that their gender identity was the same as registered at birth, the most frequent category was those answering that their gender identity was different to that assigned at birth, but who gave no specific identity. This included 33,000 Londoners (0.46 per cent).
- Trans man and Trans woman were the next most frequent categories across London. These two categories showed similar numbers overall – 11,500 (0.16 per cent) and 11,300 (0.16 per cent) respectively.
- The borough with the highest percentage responding that they had the same gender identity as registered at birth was Bromley at 94.0 per cent, while the borough with the lowest was Newham at 88.5 per cent.

Respondents in outer London boroughs were more likely to identify as the same gender as at birth. After Bromley, the boroughs with the highest percentages were Richmond (94.0 per cent), Bexley (93.8 per cent), Havering (93.7 per cent), and Sutton (93.5 per cent). The order of the boroughs was largely the same when total number responding was used as the denominator instead.”

Sexual orientation

Background context for this group:

GLA, [Census 2021 Report – Sexual orientation and Gender identity Snapshot, January 2023](#)

Key statistics on sexual orientation, as stated in the report: are:

- “86 per cent of Londoners aged 16 or over responded that they were Straight or Heterosexual. This compares to 90 per cent in the rest of England.
- Excluding Straight or Heterosexual, the top three answers in London were Gay or Lesbian (159,000), Bisexual (108,000), and Pansexual (26,000). Together these three categories comprise 4.12 per cent of the population aged 16 or over.
- The census results for those identifying as LGB+ (Lesbian, Gay, Bisexual, or other sexual orientation excluding Straight/Heterosexual) are slightly lower than those found by previous data released by the ONS, based on the Annual Population Survey (APS). Excluding non-response and don't know, 4.8 per cent in London identified as LGB+ in the Census compared to 5.7 per cent in the APS.
- As well as Straight or Heterosexual, a higher proportion answered that they were Asexual in the rest of England (0.06) than in London (0.05). Other than that, all sexual orientations were more common in London.
- The City of London and Hackney were the boroughs with the lowest percentages answering Straight or Heterosexual at 79 per cent and 80 per cent respectively.
- There was a split between inner and outer London, with respondents in inner London boroughs less likely to answer Straight or Heterosexual.”

People on low Incomes

House of Commons, [Tackling the digital divide](#), 4 November 2021

“Digital exclusion is inextricably linked to wider inequalities in society and is more likely to be faced by those on low-incomes. When the pandemic hit in March 2020, only 51 per cent of households earning between £6,000 to £10,000 had home internet access, compared with 99 per cent of households with an income over £40,000. Even when poorer households had access to equipment and internet, they were then less likely to have the skills to utilise it. The heightened reliance on digital access due to the pandemic has exacerbated many of the inequalities people who are digital excluded face, from employment and education outcomes, to access to services”.

“As digital exclusion is often caused by poverty, strategies to tackle the digital divide must align with and reinforce wider work to improve to income households’ financial resilience and include a strong focus on increasing access to affordable broadband connections and devices.”

There is also evidence to suggest that those on low incomes are less likely to have an internet connection in the home.”

House of Lords: Communications and Digital Committee, [Digital exclusion](#), 2023

“Millions of people still cannot access the internet or use it adequately. For some, skills and motivation are the main barriers. For others, affordability is the key obstacle. Others face barriers around accessibility, or poor mobile and broadband coverage. These groups face deepening isolation as society becomes increasingly digital.”

“Digitally excluded groups have less access to online deals, money advice and savings tools. Many internet packages have become significantly more expensive. Even before these changes, around 1.4 million households were struggling to pay their broadband bills and 2.3 million struggled with mobile bills, according to Ofcom’s January 2023 data. Citizens Advice estimated up to a million people cut back or stopped paying for broadband because of affordability challenges last year.”

ONS, [Exploring the UK’s digital divide](#), 4 March 2019

“Although the percentage of households without an internet connection has generally been declining, those who live alone are less likely to have an internet connection at home, than their peers. In 2018, 9% of households with a single adult aged between 16 and 64 years did not have an internet connection, compared with only 1% of households with two adults aged between 16 and 64 years. Similarly, 41% of households with a single adult aged 65 years and over had no household internet connection compared with 13% of households with two adults, at least one of whom was 65 years or older... It is important to note that these results do not include the non-private household population, which includes those living in caravans, communal establishments, temporary accommodation, and homeless people. It is likely that many of these will not have an internet connection within the household, though may have access to the internet via smartphones and tablets.”

Background context:

GLA, [Census 2021 Report – Household Deprivation](#), November 2022

The key findings, based on the analysis of Census data, is reported as follows:

- “Overall, London’s pattern of household deprivation is very close to the rest of England, with just over half of all households deprived on at least one dimension.
- “The proportion of households not deprived in any dimensions increased between 2011 and 2021, with this increase clearly greater for London than for other regions.
- “London remains the region with the highest proportion of households deprived in all four dimensions. Even though that proportion is small (0.4 per cent), it still represents more than 13,000 households in London showing all aspects of deprivation.
- “London boroughs have both the highest proportion of households deprived on at least one dimension (Barking & Dagenham, Newham, and Brent) and among the very lowest (Richmond upon Thames) of any local authorities in England.
- “At ward level, concentrations of deprived households are even more obvious, with more than one in ten households showing at least three of the four dimensions of deprivation in seven wards from Westminster, Kensington & Chelsea, Camden and Enfield.”

The report also states:

“A household is deprived in a dimension if they meet one or more of the following conditions:

- “employment: where any member of a household, who is not a full-time student, is either unemployed or long-term sick
- “education: no person in the household has at least level 2 education (five or more GCSE passes or above) and no person aged 16-18 is a full-time student
- “health and disability: any person in the household has general health that is “bad” or “very bad” or has a long-term health problem
- “housing: the household’s accommodation is either overcrowded or is in a shared dwelling, or has no central heating.”

London Datastore, [Economic Fairness: Persistent Poverty](#), 7 April 2022

“People in persistent poverty – in low-income households in at least three of the last four years – are least likely to be able to participate fully in society and achieve a healthy lifestyle.” (Quoted in EqIA for LPG: Affordable Housing LPG.)

GLA, EqIA for London Plan Guidance: [Affordable Housing LPG](#)

“People living in deprived areas and those from Black and Minority Ethnic backgrounds have been more negatively affected by the health impacts of COVID-19 (Trust for London, 2022).

“Structural inequalities in the labour market particularly affect people from BAME communities, women, those with disabilities or anyone who has experienced discrimination based upon preconceived notions of what makes a good employee (GLA, 2022).”

The report also stated:

“One in 10 working-age Londoners in work were in insecure employment (GLA, 2022). Black / Black British / Caribbean / African Londoners are over-represented in insecure employment (16%) (GLA, 2022). Black African and Bangladeshi Londoners are consistently among the lowest paid (GLA, 2021).”

The report also stated:

“There are many smaller groups in London’s population that are at particular risk of disadvantage and social exclusion but are poorly captured by data. These include:

- Looked-after children
- Homeless households and rough sleepers
- The Gypsy and Irish traveller community
- Refugees and asylum seekers
- UK armed forces veterans
- People with experience of the criminal justice system
- Children and adults with learning disabilities.”

(Quoted in EqIA for LPG: Affordable Housing LPG.)

Other groups

See above.

6.2 Gaps in evidence

The current research evidence on digital connectivity is focused much more on the theme of digital exclusion. The focus of analysis tends to be around age; disability; race; and people on low incomes.

There is lack of more nuanced evidence for some groups e.g., ascertaining whether some disabled groups (e.g., deaf, blind, or other impairment) are more reliant on certain types of DCI provision for communications or day-to-day needs; whether those with mobility issues need to travel less due to improved DCI; or whether improved DCI makes it easier for them to navigate the public realm. More generally, the analysis of the gendered nature of digital exclusion is very limited in the existing evidence available.

Groups with the following characteristics are poorly captured by data:

- 1) gender reassignment
- 2) marriage and civil partnership
- 3) pregnancy and maternity
- 4) religion and belief
- 5) sex
- 6) sexual orientation
- 7) people on low incomes
- 8) other groups.

It is expected that the characteristics listed here are likely to overlap and interact with one another, producing intersectional identities that can in turn lead to distinct patterns of discrimination and disadvantage (GLA, [Equality, Diversity and Inclusion Evidence Base for London](#), 2019). In this context, it is assumed the digital exclusion impact would be like that any disadvantaged and or vulnerable groups in society. It is expected that fast, high-quality mobile connections will benefit all Londoners, particularly those working from home, such as those with less mobility, carers, parents, and those on parental leave, as well as those on low incomes.

It is anticipated that the LPG, particularly through the plan-making elements, could target any gaps in connectivity and improve signaling. Improved DCI could take pressure off the existing networks and benefit existing users beyond the development proposal. Overall, it should have a positive impact on most groups with protected characteristics, through facilitating the provision of improved digital access for all Londoners across many areas of life and work.

7 Appendix B: Engagement summary

7.1 Summary of groups engaged and engagement record

Already engaged:

None. Engagement is yet to take place on the document.

Future engagement:

It is proposed that some targeted events or approaches will be undertaken to tackle the poor data for the underrepresented groups identified in this assessment. Nonetheless, further work will be done to identify and target these groups internally and externally via key governmental and civil society groups. This will enable the gathering of more data to establish how these groups' interests are impacted by inadequate DCI provision. It will also ensure their participation in the public consultation for this LPG.

For example, the work would proactively target a range of organisations, such as: Disability Rights UK; Digital Poverty Alliance; Age UK; Amnesty International UK; London Gypsies and Travelers; Crisis UK; the Equality and Human Rights Commission; and other organisations that support underrepresented groups discussed in this assessment.

Specific engagement to raise awareness of the consultation is also planned with key stakeholders, including the London Office of Technology and Innovation: a coalition of the GLA, London Councils, and boroughs. They work collaboratively to deliver on DCI – which, amongst other digital needs in London, will be targeted to capture a broad range of perspectives.

Through the EqIA process, all other protected groups have all been identified as being positively impacted. Given this, and the fact that this is an LPG consultation (rather than an opportunity to influence policy change), no further targeted consultation is planned.

7.2 Engagement record

Event details	Specific groups represented	Key findings

8 Appendix C: Legal context

8.1 Equality Act 2010

The Equality Act 2010 replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport, and education.

The Act prohibits victimisation and harassment, and all of the following forms of discrimination: direct; indirect; by association; by perception; or discrimination arising from disability.

The Act recognises [nine protected characteristics](#):

1. Age

A person having a particular age or being within an age group. This includes all ages, including children and young people.

2. Disability

A physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Certain medical conditions are automatically classed as being a disability- for example, cancer, HIV infection, multiple sclerosis.

3. Gender reassignment

A person has the protected characteristic of gender reassignment if they are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex ([Equality Act 2010, Section 7 \(1\)](#)).

4. Marriage and civil partnership

Marriage is a union between a man and a woman or between a same-sex couple.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act 2010).

Marriage and civil partnership are a protected characteristic for the purposes of the duty to eliminate discrimination.

5. Pregnancy or maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

6. Race

In the Equality Act, race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport.

Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race.

7. Religion or belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief (including ethical veganism) and includes a lack of belief (for example, Atheism).

8. Sex

A man or a woman.

9. Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Though not a protected group in the Equality Act 2010, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore regards people on low incomes as an additional group against which to assess equality impacts.

8.2 Public Sector Equality Duty aims

The Public Sector Equality Duty (PSED) set out at Section 149 of the Equality Act 2010 requires public bodies, when exercising its functions, to have 'due regard' to the following:

- Aim 1. eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;
- Aim 2. advance equality of opportunity between people who share a protected characteristic and those who do not;
- Aim 3. foster good relations between people who share a protected characteristic and those who do not.

The first aim means the giving advance consideration to discrimination issues before making policy decisions. It relates particularly to scrutinising policies, practices or decisions that could result in discrimination or other prohibited conduct.⁸

Having due regard to second aim involves having due regard, in particular, to the need to:

⁸ [EHRC Technical Guidance](#)

- Aim 2(a): remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Aim 2(b): take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Aim 2(c): encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Having due regard to the third aim involves having due regard, in particular, to the need to:

- 3(a) tackle prejudice, and
- 3(b) promote understanding.

The three aims of the duty are known as the 'general equality duty'. They must be fulfilled before and at the time of the exercise of a public function and on a continuing basis by the GLA when exercising its functions. Each aim must be considered in turn: for example, the obligation to have due regard to advancing equality is quite separate from the obligation to have due regard to eliminating discrimination.